

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

In re:)
) Case No. 09-50116-705
Regina Wright,) Chapter 7
)
Debtor.)

**MOTION TO REOPEN CASE, SET ASIDE DISCHARGE, AND ALLOW
THE DEBTOR TIME TO FILE MOTION TO AVOID LIEN**

Comes now, The Debtor, Regina Wright, by and through the attorney of record, and for this Motion to Reopen Case, states to the Court as follows:

1. The Debtor filed this case on October 9, 2009, and was discharged on or about January 22, 2010.
2. The Debtor is in the process of refinancing her primary residence.
3. The mortgage lender insists that all liens must be avoided with the Bankruptcy Court, in order to refinance the debtor.
4. Debtor requests that her case be reopened to file Motion to Avoid Lien regarding the lien of Beneficial Missouri, Inc.

WHEREFORE, Debtor respectfully request that the Court enter an Order granting the Debtor's Motion to Reopen Case, Set Aside Discharge, and Allow Time to File Motion to Avoid Lien and for such other and further relief as this Court deems necessary and proper under the circumstances

Respectfully submitted,
ADAMS LAW GROUP

/s/ Jack J. Adams

JACK J. ADAMS #37791; 37791MO
ADRIANA D. ADAMS# 51863; 51863MO
Attorney for Debtor
1 Mid Rivers Mall Drive, Ste. 200
St. Peters, Missouri 63376
Ph.(636) 397-4744 Fax (636) 397-3978
contact@thinkadamlaw.com

Certificate of Service

I hereby certify that a true and correct copy of the Motion was mailed, 1st class mail, postage prepaid, or by e-mail on 25th of June, 2016

US Trustee
111 S. 10th Street, Suite 6353
St Louis, MO 63102

David A. Sosne
8909 Ladue Road
St. Louis, MO 63124

Regina Wright
236 Howard Drive
Ballwin, MO 63021

/s/ Susan W Shannon
Susan W Shannon, Assistant